

Remarks

This Amendment is responsive to the Office Action dated February 09, 2005.

With respect to the claim objections to dependent Claims 10 and 12, Claim 10 has been amended to read "along the annulus passageway through the spool body." Independent Claim 1 recites an annulus passageway extending laterally through the spool body. Claim 12 has been amended as suggested by the Examiner.

Independent Claim 1 and various claims depending from Claim 1 were rejected as being anticipated by U.S. Patent 6,612,368, and Claims 1 and 4 were also rejected as being anticipated by U.S. Patent 6,659,181. The Examiner nevertheless has recognized that Claim 11 would be allowable if rewritten in independent form, and Claim 1 has been amended to include the limitations of Claim 11. Applicant respectfully submits that the '368 patent does not disclose the combination recited in dependent Claim 8, since the first seal 156 is not a lower seal with respect to either the intermediate seal or the upper seal. Amended Claim 1 and dependent Claims 2-10, 12 and 13 should thus be in condition for allowance.

With respect to independent Claim 14, this claim was rejected as being anticipated by U.S. Patent 5,992,527. The rejection by the Examiner is respectfully traversed. The Examiner has indicated that this reference discloses a tubing hanger with a tubing hanger production passageway 16 extending laterally from the tubing hanger production bore for fluid communication with the production passageway in the spool body. A lateral bore 16 as shown in Figure 1 of this reference has not, however, provided in the tubing hanger, and

instead is clearly provided in the tree cap. This distinction has been emphasized in amended Claim 14, which recites a tree cap structurally separate from the tubing hanger and positioned within the spool body central bore above the tubing hanger. Claim 14 further calls for an annulus passageway extending from the tubing annulus upward through a portion of the tubing hanger and laterally through the tubing hanger into the spool body and to an annulus line. The passageway 9 in the '527 Patent is distinguishable since it does not extend upward through a portion of the tubing hanger, but rather extends upward through the entire tubing hanger. More importantly, the annulus passageway does not extend laterally through the tubing hanger into the spool body and to the annulus line, as recited in Claim 14, but instead extends upward into the tree cap. Accordingly, Applicant submits that amended Claim 14 as well as dependent Claims 15-20 are distinguishable from the cited references. With respect to independent Claim 21, the Examiner has indicated that Claim 22 would be allowed if written in independent form. Claim 21 has been amended to include the feature of Claim 22. Accordingly, amended Claim 21 and dependent Claims 23-29 should be in condition for allowance.

Claims 30-36 have been allowed by the Examiner.

With respect to independent Claim 37, the Examiner has indicated that Claim 41 would be allowable if written in independent form. The limitations of dependent Claim 41 and intervening Claim 38 have been added to independent Claim 37. Applicant submits that amended Claim 37 as well as dependent Claims 39, 40, and 42 should thus be in condition for allowance.

Claims 43-48 have been allowed by the Examiner.

With respect to independent Claim 49, this claim has been amended in a manner similar to Claim 14 to recite a tree cap structurally separate from the tubing hanger and positioned within the spool body central bore above the tubing hanger. As previously noted, the Examiner contends that U.S. Patent 5,992,527 discloses a tubing hanger with a lateral production passageway 24 therein, but the lateral production passageway 24 is clearly provided in the tree cap and not in the tubing hanger. The claim is also objected to as being anticipated by U.S. Patent 2,889,886. The plate 149 as shown in Figure 12 is not positioned within the spool body central bore above the tubing hanger, and instead is bolted on top of the spool body.


With respect to dependent Claim 51, the '886 Patent does not disclose first and second closure members each received within the vertical bore in the tree cap. Member G is a nipple which may close off the upper end of the bore 46, but number 63 is an extension that does not perform a function of closing off flow.

Independent Claim 49 is also rejected as being anticipated by U.S. Patent 6,755,254. Amended Claim 49 is distinguishable from the '254 Patent which does not disclose both first and second closure members each received within the vertical bore in the tree cap for closing off flow through the tree cap. Accordingly, amended Claim 49 and dependent Claims 52-57 are distinguishable from the cited art.

Appl. No.: 10/730,799
Amendment Dated: March 17, 2005
Reply to Office Action of February 9, 2005

Early allowance of the application is requested.

Respectfully submitted,

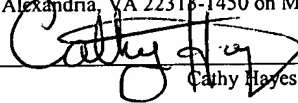

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I hereby certify that this document and all referenced enclosures are being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22318-1450 on March 17, 2005.


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